

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FIRST GUARANTY MORTGAGE
CORPORATION, *et al.*,¹

Debtors.

)
) Chapter 11
)

) Case No. 22-10584 (CTG)
)

) (Jointly Administered)
)
)

Hearing Date: January 26, 2023 at 3:00 p.m. (ET)
Objection Deadline: January 11, 2023 at 4:00 p.m. (ET)

**NOTICE OF MOTION FOR ENTRY OF AN ORDER FURTHER EXTENDING THE
DEADLINE WITHIN WHICH DEBTORS MAY REMOVE ACTIONS**

PLEASE TAKE NOTICE that on December 27, 2022, the above-captioned debtors and debtors in possession (the “Debtors”) and Tanya Meerovich, as the Liquidating Trustee for the FGMC Liquidating Trust (the “Trustee”) filed the *Motion for Entry of an Order Further Extending the Deadline Within Which Debtors May Remove Actions* [Docket No. 476] (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE that any responses to the Motion must be in writing and filed with the Clerk of the United States Bankruptcy Court for the District of Delaware, 824 Market Street, Third Floor, Wilmington, Delaware 19801, and served upon the undersigned, so as to be received on or **before 4:00 p.m. (Eastern Time) on January 11, 2023.**

PLEASE TAKE FURTHER NOTICE that at the same time, you must also serve a copy of the response or objection upon counsel for the Debtors and the Liquidating Trustee: (i) Dentons US LLP, 601 S. Figueroa, Suite 2500, Los Angeles, CA 90017, Attn: Samuel R. Maizel

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number, are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The Debtors’ mailing address is 5800 Tennyson Parkway, Suite 450, Plano, TX 75024.

(samuel.maizel@dentons.com) and Tania M. Moyron (tania.moyron@dentons.com), and (ii) Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, P.O. Box 8705, Wilmington, DE 19899-8705 (Courier 19801), Attn: Laura Davis Jones (ljones@pszjlaw.com).

PLEASE TAKE FURTHER NOTICE THAT, IF AN OBJECTION IS PROPERLY FILED AND SERVED IN ACCORDANCE WITH THE ABOVE PROCEDURES, A HEARING WILL BE HELD ON **JANUARY 26, 2023 AT 3:00 P.M. (EASTERN TIME)** BEFORE THE HONORABLE CRAIG T. GOLBLATT, UNITED STATES BANKRUPTCY JUDGE FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, COURT ROOM #7, THIRD FLOOR, WILMINGTON, DELAWARE 19801. ONLY OBJECTIONS MADE IN WRITING AND TIMELY FILED WILL BE CONSIDERED BY THE BANKRUPTCY COURT AT SUCH HEARING.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: December 27, 2022

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Mary F. Caloway

Laura Davis Jones (DE Bar No. 2436))
Timothy P. Cairns (DE Bar No. 4228)
Mary F. Caloway (DE Bar No. 3059)
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, Delaware 19899 (Courier 19801)
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: ljones@pszjlaw.com
tcairns@pszjlaw.com
mcaloway@pszjlaw.com

and

DENTONS US LLP
Samuel R. Maizel
Tania M. Moyron
601 S. Figueroa Street #2500
Los Angeles, CA 90017
Telephone: (213) 623-9300
Email: Samuel.maizel@dentons.com
Tania.Moyron@dentons.com

DENTONS US LLP
David F. Cook
1900 K. Street, NW
Washington, DC 20006
Telephone: (202) 496-7500
Email: david.f.cook@dentons.com

Counsel for the Debtors and Debtors in Possession